

1 THE HONORABLE RICHARD A. JONES
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

9 STEVE TEIXEIRA,
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11 Plaintiff,
12 v.
13 MOZILLA CORPORATION a.k.a. M.F.
14 Technologies, a California corporation;
15 MOZILLA FOUNDATION, a California
16 public benefit corporation; LAURA
17 CHAMBERS and her marital community;
18 WINIFRED MITCHELL BAKER and her
19 marital community, and DANI CHEHAK and
20 her marital community,
21
22 Defendants.

Case No.: 2:24-CV-01032-RAJ

DECLARATION OF AMY
ALEXANDER IN SUPPORT OF
PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION TO
CONTINUE AND TO AMEND CASE
SCHEDULE

I, Amy Alexander, am over the age of 18, have personal knowledge of all the facts stated herein and declare as follows:

1. I am an attorney at Stokes Lawrence, P.S. and am counsel of record for Plaintiff Steve Teixeira.

2. Plaintiff initiated this action almost a year ago, on June 12, 2024, by privately serving but not filing his Complaint on Mozilla Corporation ("Mozilla") under Washington Civil Rule 3. With the consent of all Defendants, Mozilla filed the Complaint in federal court,

24 DECLARATION OF AMY ALEXANDER IN SUPPORT OF
25 PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO
26 CONTINUE AND TO AMEND CASE SCHEDULE - 1
27 60606-003

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1 removing the action to this Court on a month later on July 12, 2024. Plaintiff served all
2 Defendants with discovery requests shortly after, on July 26, 2024.

3 3. Attached hereto as **Exhibit 1** is a true and correct copy an email thread dated
4 September 3, 2024 involving Defendant Mozilla Foundation (“the Foundation”) requesting an
5 extension to respond to Plaintiff’s first set of discovery requests.

6 4. Attached here to as **Exhibit 2** is a true and correct copy of an email thread dated
7 August 30, 2024 involving Defendant Mozilla Corporation (“Mozilla”) and Individual
8 Defendants requesting an extension to respond to Plaintiff’s first set of discovery requests.

9 5. Attached hereto as **Exhibit 3** is a true and correct copy of an email thread dated
10 September 25, 2024 involving Plaintiff’s counsel raising concerns about Mozilla’s and
11 Individual Defendants’ discovery responses and failure to adhere to the parties’ ESI protocol.

12 6. Attached hereto as **Exhibit 4** is a true and correct copy of an email thread dated
13 October 31, 2024 involving Plaintiff’s counsel raising concerns about the Foundation’s discovery
14 responses and failure to adhere to the parties’ ESI protocol.

15 7. Attached hereto as **Exhibit 5** is a true and correct copy of email correspondence
16 between Plaintiff, Mozilla, and Individual Defendants regarding search terms and
17 methodologies.

18 8. Attached hereto as **Exhibit 6** is a true and correct copy of the Foundation’s
19 responses to Plaintiff’s First Set of Discovery requests dated September 10, 2024.

20 9. Attached hereto as **Exhibit 7** is a true and correct copy of an email thread dated
21 April 3, 2025 involving correspondence between Plaintiff and Mozilla regarding an extension to
22 the trial date and associated deadlines.

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1 10 The Parties filed a Joint Status Report and Discovery Plan on August 13, 2024,
 2 (Dkt # 13), and estimated the case would be ready for trial between June 24, 2025 to August 25,
 3 2025. The Court issued an Order Setting the Trial Date and Related Dates on August 19, 2024
 4 (Dkt # 16) setting the trial on October 6, 2025.

5 11. Until April 8, 2025, Mozilla and the Foundation had only produced 205 pages of
 6 documents combined in response to requests issued in July 2024. To date, Individual Defendants
 7 have not produced any documents at all. The Foundation and Mozilla did not issue additional
 8 discovery requests until April 14 and 16, 2025, respectively.

9 12. Mozilla sent Plaintiff a discovery deficiency letter dated February 4, 2025 related
 10 to Plaintiff's October 11, 2024 discovery responses.

11 13. Attached hereto as **Exhibit 8** is a true and correct copy of email correspondence
 12 between Mozilla and Plaintiff regarding Mozilla's motion to continue deadlines.

13 14. Attached hereto as **Exhibit 9** is email correspondence begun by Plaintiff on April
 14 2, 2025, regarding scheduling depositions for both Plaintiff and Defendants.

15 15. Plaintiff completed his production in response to Defendants Mozilla and the
 16 Foundation's first sets of discovery requests on April 25, 2025.

17 16. Attached hereto as **Exhibit 10** is a true and correct copy of Defendant Winifred
 18 Mitchell Baker's Objections to Plaintiff's Second Set of Interrogatories and Requests for
 19 Production dated April 2, 2025.

20 17. Plaintiff made Fed. R. Civ. P. 26(2) disclosures on April 9, 2025. Defendants did
 21 not disclose any experts on this date.

22 I declare under penalty of perjury under the laws of the United States of America that the
 23 foregoing is true and correct.

24 DECLARATION OF AMY ALEXANDER IN SUPPORT OF
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1 DATED this 12th day of May, 2025

2 STOKES LAWRENCE, P.S.

3 By: /s/ Amy Alexander
4 Amy Alexander, WSBA No. 44242

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DECLARATION OF AMY ALEXANDER IN SUPPORT OF
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